

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DWIGHT RUSSELL, et al.,

Plaintiffs,

v.

HARRIS COUNTY, TEXAS, et al.,

Defendants.

Civil Action No. 4:19-cv-226

**OPPOSED MOTION TO INTERVENE
BY THE STATE OF TEXAS, GREG ABBOTT, GOVERNOR OF TEXAS, AND
KEN PAXTON, ATTORNEY GENERAL OF TEXAS**

The State of Texas, the Honorable Greg Abbott, Governor of Texas, and the Honorable Ken Paxton, Attorney General of Texas (“State Intervenors”), by and through the Attorney General of Texas, and pursuant to Federal Rule of Civil Procedure 24, move to intervene as defendants in the above-captioned action. In support of this Motion, the State Intervenors rely on the following contemporaneously filed documents:

1. Memorandum in Support of State Intervenors’ Motion to Intervene;
2. [Proposed] Order Granting State Intervenors’ Motion to Intervene; and
3. State Intervenors’ Notice of Opposition.

For the reasons stated in this Motion and accompanying documents, State Intervenors respectfully request that the Court grant this Motion to Intervene.

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

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First Assistant Attorney General

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Deputy Attorney General for Civil Litigation

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/s/ Adam Arthur Biggs
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**COUNSEL FOR THE STATE OF TEXAS, THE
GOVERNOR OF TEXAS, AND THE ATTORNEY
GENERAL OF TEXAS**

CERTIFICATE OF CONFERENCE

I hereby certify that, I conferred with counsel for Plaintiffs and Defendants, via email on March 29, 2020, regarding the substance of the foregoing instrument. However, due to the fast-moving nature of this litigation, understandably, no response has yet been received. The parties are assumed to be opposed.

/s/ Adam Arthur Biggs

ADAM ARTHUR BIGGS
Special Litigation Counsel

CERTIFICATE OF SERVICE

I, Adam Arthur Biggs, hereby certify that on this the 29th day of March, 2020, a true and correct copy of the foregoing document was transmitted using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Adam Arthur Biggs

ADAM ARTHUR BIGGS